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*Counsel for the Liquidators of Lehman Brothers
Australia Limited*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:	:	
	:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., et al.,	:	
	:	Case No. 08-13555 (JMP)
Debtors.	:	
	:	(Jointly Administered)
	:	

**NOTICE OF WITHDRAWAL OF NOTICE OF INTENT TO
PARTICIPATE IN DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that Lehman Brothers Australia Limited, by its counsel Kirkland & Ellis LLP hereby withdraws, without prejudice, its Notice of Intent to Participate in Discovery Related to Plan Confirmation, served on April 28, 2011, in accordance with the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011 [Docket No. 16003] (the "Order"). A copy of the original Notice of Intent to Participate in Discovery Related to Plan Confirmation is attached hereto as **Exhibit A**. Lehman Brothers Australia Limited has not accessed any Confidential

Information (as defined in the Order), but reserves its right to seek all appropriate discovery that is permitted pursuant to the Order, the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure and any other applicable provisions of law.

Dated: July 6, 2011
New York, New York

/s/ James H.M. Sprayregen

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*Counsel for the Liquidators of Lehman
Brothers Australia Limited*

Exhibit A

Notice of Intent to Participate in Discovery Related to Plan Confirmation

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
: **08-13555 (JMP)**
LEHMAN BROTHERS HOLDINGS INC., et al., : **(Jointly Administered)**
Debtors. :
-----X

**NOTICE OF INTENT TO PARTICIPATE IN
DISCOVERY RELATED TO PLAN CONFIRMATION**

NOTICE IS HEREBY GIVEN that Lehman Brothers Australia Limited and the affiliated parties attached hereto on Schedule A, represented by Kirkland & Ellis LLP, have filed the claims listed on the attached Schedule B against Lehman Brothers Holdings Inc. and are parties in interest in the confirmation of a plan in the above-captioned chapter 11 cases (the "Chapter 11 Cases") on the basis that such parties have filed claims and are foreign affiliates of the Debtors.

ACCORDINGLY, PLEASE TAKE FURTHER NOTICE that, subject to any objections by the Debtors or the Statutory Committee of Unsecured Creditors appointed in the Chapter 11 Cases and/or any limitations imposed by the Court, the above-named party in interest and its counsel intends to participate as follows in Plan Discovery, as defined in the Order Establishing Procedures in Connection with Discovery Related to Plan Confirmation and Other Issues, entered by the Court on April 14, 2011 [Docket No. 16003].

Dated: April 28, 2011 /s/ David R. Seligman
On behalf of the liquidators of Lehman Brothers Australia Limited

Contact Information for Party in Interest (address, phone and email):

c/o Mr. Stephen Parbery and Mr. Marcus Ayres

PPB Advisory, Level 46, MLC

19 Martin Place Sydney NSW 2000 Australia

Telephone: +612 8116 3000

E-mail: sparbery@ppbadvisory.com; mayres@ppbadvisory.com

Contact Information for Attorneys for Party in Interest (address, phone and email):

Jeffrey W. Gettleman

Kirkland & Ellis LLP

300 North LaSalle Street, Chicago, IL 60654

Telephone: (312) 862-2000

E-mail: jeffrey.gettleman@kirkland.com

Contact Information for Advisors for Party in Interest (address, phone and email):

N/A

Designation of Contact(s) to Receive Any Notice(s) Required Under the Order
(address, phone and email):

Marcus Ayres

PPB Advisory, Level 46, MLC

19 Martin Place Sydney NSW 2000 Australia

Telephone: +612 8116 3000

E-mail: mayres@ppbadvisory.com

Group that Participant elects to join (pursuant to Paragraph 3(b) of the Order):

Group 9

Schedule A

- Lehman Brothers Australia Finance Pty Limited (Subject to Deed of Company Arrangement)
- Lehman Brothers Australia Granica Pty Limited (Subject to Deed of Company Arrangement).
- Lehman Brothers Australia Limited (In Liquidation)
- Lehman Brothers Real Estate Australia Commercial Pty. Ltd.

Schedule B

<u>Claim Number</u>	<u>Amount</u>	<u>Debtor</u>
894	\$500,000.00	Lehman Brothers Special Financing Inc.
895	\$5,000,000.00	Lehman Brothers Special Financing Inc.
1332	\$454,357.00	Lehman Brothers Special Financing Inc.
1509	\$62,756,805.00	Lehman Brothers Special Financing Inc.
2906	\$62,756,805.00	Lehman Brothers Special Financing Inc.
36982	\$63,016,868.80	Lehman Brothers Holdings Inc.
48829	\$5,500,000.00	Lehman Brothers Holdings Inc.
58607	\$983,055,860.00 (excluding interest and costs)	Lehman Brothers Holdings Inc.
63500	\$983,055,860.00 (excluding interest and costs)	Lehman Brothers Holdings Inc.
63839	\$759,367.00	Lehman Brothers Holdings Inc.
63840	\$73,658,925.00	Lehman Brothers Holdings Inc.
63841	\$51,927,268.00	Lehman Brothers Special Financing Inc.
63842	\$1,374,264.00	Lehman Brothers Holdings Inc.
63843	\$4,532,110.00	Lehman Brothers Holdings Inc.